

REMARKS

The applicant has reviewed the Official Action mailed on 4 June 2004 and the art cited therein, and submits this paper as a reply thereto. The applicant requests entry of the above claim revisions and consideration of these comments.

5 Pending Claims 1-23

Paragraph 2 of the Official Action stated a rejection of claims 1-23 as being anticipated under § 102(e) by Uppaluru. The applicants have amended pending independent claims 1 and 23 to state further features of the invention that are not believed shown or suggested by Uppaluru, with various dependent claims also being amended for consistency with the revised independent 10 claims. In particular, claims 1 and 23 now recite systems and methods relating to a call center that comprises a “hub” arranged to have a one-to-many relationship to a plurality of remote sites. The applicant submits that at least Figure 1 and the related discussion in the specification fully support these added features under § 112, first paragraph. The applicant further submits that 15 Uppaluru does not support a § 102 rejection of the claims pending in this application, as discussed in more detail below, and thus requests reconsideration and withdrawal of the rejections based on Uppaluru.

Turning to Uppaluru in more detail, one of its objectives appears to be to minimize long distance toll charges accruing while callers wait on-hold for a live call center agent. See *Uppaluru*, column 1, lines 39-44. Uppaluru achieves this objective by providing a plurality of 20 POP call center gateways distributed to be close to points from which callers may originate calls. When a call is made from a given point, a POP call center gateway near this given point preferably intercepts this call and holds it while the caller awaits a live agent, thereby incurring local rather than long distance toll charges. See *Uppaluru*, column 2, lines 31-56. To the extent that Uppaluru’s POP call center gateways correspond to the “hubs” recited in the applicant’s 25 specification and claims, the applicant submits that Uppaluru neither discloses nor suggests providing a single call center “hub” having a one-to-many relationship with a plurality of remote call center sites. In contrast, Uppaluru discloses a plurality of POP call center gateways that have a many-to-many relationship with a plurality of business call centers, assuming the latter correspond to the applicant’s claimed “remote sites”. Given Uppaluru’s teaching to reduce 30 telecommunications charges by distributing many local POP call center gateways “close” to

potential originating calls, Uppaluru's local POP call center gateways would appear to require a many-to-one or a many-to-many relationship with the various business call centers to which the calls would be ultimately directed. Neither of these two relationships would meet the applicant's claimed one-to-many relationship. Thus, the applicant submits that Uppaluru neither discloses 5 nor suggests the invention as recited in claims 1 and 23, and all claims depending therefrom.

New Independent Claim 40

New independent claim 40 recites a method for handling incoming calls to a call center. The comments above regarding independent claims 1 and 23 are believed also applicable to new independent claim 40, with respect to support in the applicant's specification and the Uppaluru 10 reference.

New Dependent Claims 33-37, and 41 Added Herein

New dependent claims 33-37, and 41 recite various aspects of a call center comprising a single hub. This claimed feature is believed fully supported under § 112, 1st paragraph on the same basis as the features added to independent claims 1 and 23 and discussed above.

15 New Dependent Claims 38, 39, and 42 Added Herein

New dependent claims 38, 39, and 42 recite various aspects of the internal DNIS parameter as described by the applicant, at least at page 14, lines 11-14 and page 17, lines 1-4, to route calls to various ones of the remote sites.

New Claims 24-32 Added Herein

20 The applicant has added new claims 24-32 to recite further details of the invention not believed shown by the cited art. Each of these new claims is believed fully supported by the specification under § 112, 1st paragraph, as detailed more particularly with each claim discussed below. Further, each of these new claims recites features similar to those discussed above in connection with revised independent claims 1 and 23, and at least on this basis, the applicant 25 submits that the cited art does not support a rejection of these new claims.

New independent claim 24 recites, in part, features of the invention as described in the specification at least at page 7, lines 15-20, discussing a plurality of remote locations that have staggered hours of operation, and as described at page 8, lines 5-10, discussing the placement of remote locations where a locally-available workforce can staff the remote locations.

New independent claim 25 recites, in part, features of the invention as described in the specification at least at page 8, lines 5-10, discussing the placement of remote locations where a locally-available workforce can staff the remote locations.

5 New independent claim 26 recites, in part, features of the invention as described in the specification at least at page 8, lines 11-20, discussing concentrating high-cost capital assets in the central “hub” while minimizing the cost of capital assets allocated to the remote sites, with the hub and the remote sites being connected via a network to have a one-to-many relationship.

10 New claims 27 and 28 depend from claim 26 and recite various aspects of establishing staggered times of operations for the various remote call center sites. The applicants submit that new claims 27 and 28 are fully supported at least by page 7, lines 15-20, as discussed above in connection with claim 24.

New claim 29 depends from claim 26 and recites remote sites at locations selected based on accessibility to local labor available to staff the sites. The applicants submit that new claim 29 is fully supported at least by page 8, lines 5-10.

15 New independent claim 30 recites, in particular, features of the invention as described in the specification at least at page 7, lines 15-20, discussing a plurality of remote locations that have staggered hours of operation, and routing calls to these remote locations according to parameters that represent these staggered hours of operation.

20 New claims 31-33 depend from claim 1 and recite various aspects of a call center system that includes a plurality of remote sites, with various ones of the sites having respective staggered hours of operation. As discussed above with the other new claims, this feature is believed fully supported by the applicant’s specification.

The applicant requests entry, consideration, and favorable action on this response at the earliest convenience of the Office.

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Respectfully submitted,

WEST CORPORATION

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